However, it is respectfully submitted that the identified portion of Mizutani, and indeed Mizutani as a whole, fails to disclose or suggest all features of claim 1 of the present application. In particular, it is respectfully submitted that Mizutani fails to disclose or suggest the feature of "discarding features of the threshold binary image having a size less than a predetermined size". In this regard, it is noted that, at column 2 lines 3-9 and lines 14-24 identified by the Examiner, Mizutani fails to disclose discarding of any edge features identified in the initial image. Mizutani discloses that a luminance and colour of each brush stroke may be selected from one pixel in the initial image (column 2 lines 3-5), and that a small random variation or dithering of the pixels of the brush stroke may be introduced to produce a more realistic result (column 2 lines 10-12). Mizutani goes on to disclose that the orientation of a given brush stroke (vertical, horizontal, or diagonal) is arranged perpendicular to a direction of maximum contrast (column 2 lines 15-21). The size of each brush stroke portion may be altered in regions of high contrast, simulating detailed brush strokes usually created near object edges (column 2 lines 26-30).

From the disclosure discussed above, which has been identified in item 5 of the Final Official Action as anticipating claim 1, it is clear that Mizutani entirely fails to disclose or suggest any step of discarding features of the image which are smaller than a predetermined size. This feature was introduced in the Amendment filed 30 October 2000 in order to distinguish the present invention from Mizutani, and it is respectfully submitted that the portions of Mizutani identified by the Official Action do not disclose or suggest this feature. The advantage of including this feature in the present invention is described in the present specification (see page 7 lines 13, 18 and 28-30, page 8 lines 3, 9 and 10 and page 8 line 11 to page 12 second last paragraph). Accordingly, it is respectfully submitted that claim 1 as amended 30 October 2000 is neither disclosed nor suggested by Mizutani.

With respect to the 35 USC § 102 rejections of claims 2 and 4 to 7, it is respectfully submitted that the preceding illustrate that claim 1 is in a format ready for allowance. Accordingly, at least by virtue of dependency on claim 1, it is respectfully submitted that Claims 2 and 4 to 7 are in a format ready for allowance.

Under the heading "Claim Rejections – 35 U.S.C. § 103", the Examiner rejects claim 3 as being unpatentable over US Patent No. 5,621,868 (Mizutani) in view of US Patent No.

5,999,190 (Sheasby). The Examiner's comments in this regard have been carefully considered. It is submitted that the preceding arguments and the arguments filed 30 October 2000 illustrate that claim 1 is in a format ready for acceptance. Given that claim 3 depends from claim 1, it is submitted that claim 3 is patentably distinguishable over the cited prior art at least by virtue of dependency on claim 1.

Accordingly, it is respectfully submitted that the Examiner's rejections under 35 U.S.C. § 103 have been successfully traversed.

Under the heading "Response to Arguments", the Examiner states that the arguments filed 30 October 2000 are not persuasive. The Examiner's comments in this regard have been carefully considered. It is noted that Mizutani discloses (at column 8 lines 52-55, and column 9 lines 1-48), the use of a Sobel filter for the purpose of generating values representative of the contrast in the image at each respective pixel. However, at columns 8-10, Mizutani again fails to disclose a step of discarding edge features having a size which is less than a predetermined size. In this regard, it is noted that the disclosure of Mizutani at column 10 lines 23-42 identified by the Examiner can be seen to be analogous to a step of "skeletonising" the contrast map produced by Sobel filtering (see figures 16A and 16B and column 10 lines 2 and 3). The presence of a first buffer with processed pixels and a second buffer with unprocessed pixels neither discloses nor suggests a step of discarding edge features having a size less than a predetermined size. Rather, Mizutani discloses modification of the first buffer (Col 8 line 41 to col 10 line 21), after which the modified first buffer is combined with the unmodified second buffer. The effect of modifying the first buffer is to "increase the emphasis on edges in images" (Col 10 lines 2 and 3). Combining the first and second buffers in the manner disclosed "causes edges in relatively light-colored areas to have bright outlines, while causing edges in relatively dark-coloured areas to have dark outlines" (Col 10 lines 34 to 36). Clearly the use of first and second buffers in Mizutani teaches directly away from discarding edge features of less than a predetermined size. Accordingly, it is respectfully submitted that Mizutani fails to disclose or suggest all features of claim 1, and it is therefore respectfully submitted that the present invention as defined in claim 1 is novel over Mizutani.

CONCLUSION

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,

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